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Via ECF and Email (Torres_NYSDChambers@nysd.uscourts.gov)

The Hon. Analisa Torres
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl St.
 New York, NY 10007-1312

Neuhauser v. Bolivarian Republic of Venezuela/Case No. 1:20-CV-10342 (AT)

Dear Judge Torres:

We represent plaintiff Alexander Neuhauser (“Plaintiff”) in the above-referenced action. Pursuant to section I(C) of Your Honor’s Individual Practices in Civil Cases, we submit this letter-motion to request an extension of time until March 6, 2024 to file a revised motion for default judgment.

On July 3, 2023, this Court filed a certain order (the “Order”) denying Plaintiff’s motion for default judgment without prejudice to renewal, and providing Plaintiff until August 3, 2023 to file a revised motion (see Dkt. No. 43). Previously, on July 20, 2023, this Court granted Plaintiff’s first letter motion for an extension of time until September 8, 2023 (see Dkt. No. 45), on September 6, 2023, this Court granted Plaintiff’s second letter motion for an extension of time until October 9, 2023 (see Dkt. No. 47), and on October 6, 2023, this Court granted Plaintiff’s third letter motion for an extension of time until December 6, 2023 (see Dkt. No. 49).

We are requesting this fourth extension of time because Plaintiff is elderly and unfortunately faces significant and continuing health issues. We have been diligently following up with Plaintiff, but communications have been delayed. We wish to do everything we can to accommodate Plaintiff’s health and circumstances in order to proceed with the revised default motion, so we respectfully request this additional time to obtain Plaintiff’s revised declaration and needed exhibits for our revised motion.

This is Plaintiff’s fourth request for an extension of time to file a revised motion for default judgment, and Defendant Bolivarian Republic of Venezuela has not appeared in this action to date.



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We apologize to this Court for Plaintiff's delay in filing the revised motion and greatly appreciate the Court's consideration. Please let me know if there is any additional information that Plaintiff can provide to the Court related to this request.

Respectfully,

/s/ Joshua H. Epstein

Joshua H. Epstein

GRANTED.

SO ORDERED.

Dated: December 5, 2023
New York, New York


ANALISA TORRES

United States District Judge